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f/k/a GES Exposition Services, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:

Coastal International Inc.,

Debtor

Bankruptcy Case No. 19-13584-TA
Chapter 11

**NOTICE OF MOTION OF GLOBAL
EXPERIENCE SPECIALIST F/K/A GES
EXPOSITION SERVICES, INC. TO
DISMISS OR TRANSFER VENUE
PURSUANT TO 28 U.S.C. §§ 1408 AND
1412 AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 1014(a)**

*[Filed concurrently with Motion; Declaration
of Leib M. Lerner; and Request for Judicial
Notice]*

Hearing

Date: October 24, 2019

Time: 3:00 p.m.

Place: Courtroom 5B
411 West Fourth Street
Santa Ana, CA 92701

1 **TO THE COURT, ALL CREDITORS, PARTIES IN INTEREST, AND THE**
2 **UNITED STATES TRUSTEE:**

3 **PLEASE TAKE NOTICE** that Global Experience Specialist f/k/a GES Exposition
4 Services, Inc. (“**GES**”), has filed a Motion to Dismiss or Transfer Venue (“**Motion**”) pursuant to
5 28 U.S.C. §§ 1408 & 1412 and Federal Rule of Bankruptcy Procedure 1014(a), and that a hearing
6 will be held before the Honorable Theodor Albert, United States Bankruptcy Judge, on October
7 24, 2019, at 3:00 p.m., at the United States Bankruptcy Court, in Courtroom 5B, located at 411
8 West Fourth Street, Santa Ana, CA 92701.

9 **PLEASE TAKE NOTICE** that GES is seeking entry of an order dismissing this case or
10 transferring it to the United States Bankruptcy Court for the Northern District of California,
11 which is Debtor Coastal International Inc.’s (“**Debtor**”) true principal place of business and assets
12 for the past 30 years, in the interest of justice and the convenience of the parties.

13 **PLEASE TAKE FURTHER NOTICE** that this Motion is based upon this Notice of
14 Hearing, the concurrently filed Motion and the Declaration of Leib M. Lerner, the entire record in
15 this case, and such further evidence and argument as may be made at the hearing.

16 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Court’s September 24, 2019
17 Scheduling Order, any responsive papers shall be filed by October 11, 2019. [Doc. 2].

18 **PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 9013-1(h)
19 failure to timely file and serve a response may be deemed by the Court as consent to the granting
20 of the Motion.

21
22 Dated: October 2, 2019

ALSTON & BIRD LLP

23
24 **By: /s/ Leib M. Lerner**

25 Leib M. Lerner
26 Attorneys for Global Experience Specialist
27 f/k/a GES Exposition Services, Inc.
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: Alston & Bird LLP, 333 S. Hope Street, 16th Floor, Los Angeles, CA 90071

NOTICE OF MOTION OF GLOBAL EXPERIENCE SPECIALIST F/K/A GES EXPOSITION SERVICES, INC. TO DISMISS OR TRANSFER VENUE PURSUANT TO 28 U.S.C. §§ 1408 AND 1412 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 1014(a)

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 10/2/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Reem J Bello** rbello@wglp.com, kadele@wglp.com;vroales@wglp.com;cyoshonis@wglp.com;cbmeeker@gmail.com
- **Jeffrey I Golden** jgolden@wglp.com, kadele@wglp.com;vroales@lwglp.com;cbmeeker@gmail.com
- **Nancy S Goldenberg** nancy.goldenberg@usdoj.gov
- **Alan Craig Hochheiser** ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- **Leib M Lerner** leib.lerner@alston.com, autodockettest-lax@alston.com
- **Elan S Levey** elan.levey@usdoj.gov, louisa.lin@usdoj.gov
- **William McCormick** Bill.McCormick@ag.tn.gov
- **United States Trustee (SA)** ustregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On 10/2/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/2/2019

Date

Rosa Nelly Villaneda

Printed Name

/s/ Rosa Nelly Villaneda

Signature

Honorable Theodor C. Albert United States Bankruptcy Court 411 West Fourth Street, Suite 5085, Courtroom 5B Santa Ana, CA 92701-4593	Northern California Carpenters Fund PO Box 882134 San Francisco, CA 94188-2134	AmTrust North America Attn: Accounts Receivable 800 Superior Ave. E. 21st Floor Cleveland, OH 44114-2613
American Express Corp. Svcs. Attn: US Payment FL 1801 NW 66th Ave., Suite 103A Fort Lauderdale, FL 33313-4571	Chicago Regional Council of Carpenters 12 East Erie Street Chicago, IL 60611-2796	Laborers Trust Fund for Northern CA PO Box 882913 San Francisco, CA 94188-2913
Trust Fund Office Local Union 831 STD PO Box 513435 Los Angeles, CA 90051-3435	Sign Pictorial Display Industry Allied PO Box 45186 San Francisco, CA 94145-0186	Teamsters Local 631 Security Fund PO Box 844552 Los Angeles, CA 90084-4552
Anthem Blue Cross PO Box 51011 Los Angeles, CA 90051-5311	Spangler, Kathleen 554 16th Avenue San Francisco, CA 94118-3509	Western Conference of Teamsters 2323 Eastlake Avenue East Seattle, WA 98102-3393
Lopez, Jesus 4585 San Juan Avenue Fremont, CA 94536-5544	Randall, Dee 38 Red Hill Circle Belvedere Tiburon, CA 94920-1700	Johnson, Amy 543 Wisteria Way San Rafael, CA 94903-2425
Gorman, Michael 11 Jeffrey Lane Hightstown, NJ 08520-1703	Shell Fleet Plus- WEX BANK PO Box 4337 Carol Stream, IL 60197-4337	Cowperthwait, Shelley 6802 Bayberry Creek Las Vegas, NV 89130-4999
	Boone, Mike 4065 Lavergne Antioch, TN 37013	Willwork Global Event Services 23 Norfolk Avenue, Suite A South Easton, MA 02375-1187

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.